

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LANE MYERS

Plaintiff,

v.

CHRISTOPHER WREN, NICHOLAS
SMITH and UNKNOWN FRERIKS,

Defendants.

Case No: 1:22-cv-00748

Hon. Paul L. Maloney

**STIPULATION AND
PROPOSED ORDER
REGARDING REMOTE
DEPOSITIONS**

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STIPULATION AND PROPOSED ORDER REGARDING REMOTE DEPOSITIONS

Plaintiff and Defendants ("the Parties"), by and through the undersigned, hereby stipulate and agree pursuant to FRCP 30(b)(4) to the following protocol for conducting depositions by remote means in this action:

1. All depositions in this action, except for that of Ethan Wright, shall be conducted remotely using videoconference technology, and all deponents shall be video recorded. "Remote" or "remotely" means that the participants will appear from different locations using a designated videoconference platform.

2. The remote deposition testimony may be used in this action with the same force and effect as an in-person deposition. The parties agree not to object to the use of the deposition testimony on the basis that the deposition was taken and recorded remotely. The parties reserve the right to raise all other available objections to the use of the deposition testimony in this action.
3. Each person attending a deposition shall be visible to all other participants, their statements shall be audible to all participants, and they should each strive to ensure their environment is free from noise and distractions.
4. Remote depositions shall be recorded by stenographic means consistent with the requirements of Rule 30(b)(3) of the Federal Rules of Civil Procedure.

STIPULATED AS TO FORM AND SUBSTANCE:

FOSTER SWIFT COLLINS & SMITH, P.C.
Attorneys for Defendants

Dated: December 28, 2022

By: /s/ Leslie A. Dickinson
Michael D. Homier (P60318)
Leslie A. Dickinson (P78850)

Dated: December 28th, 2022

By: 
Lane Myers (Plaintiff)

IT IS SO ORDERED.

Date: January 5, 2023

/s/ Paul L. Maloney
Hon. Paul L. Maloney
United States District Court Judge